

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Menders et. al.,

Plaintiffs,

v.

Loudoun County School Board,

Defendant.

Case No. 1:21-cv-00669-AJT-TCB

**CORRECTED MOTION OF PLAINTIFFS FOR COURT TO
JUDICIALLY NOTICE CERTAIN FACTS IN SUPPORT OF THEIR
MOTION TO PROCEED ANONYMOUSLY**

According to Federal Rule of Evidence 201, Plaintiffs ask this Court to take judicial notice of the various news articles in their Motion to Proceed Anonymously (Dkt. No. 7) that they have filed alongside this motion. Rule 201(b) states that a court may “judicially notice a fact that is not subject to reasonable dispute because it (1) is generally known within the Court’s territorial jurisdiction; or (2) can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned.” As a result, courts have judicially noticed “information in the news.” *United States v. Stavrakis*, No. ELH-19-00160, 2020 U.S. Dist. LEXIS 221438, at *5 n.7 (D. Md. Nov. 25, 2020).

Here, the news articles cited on pages 1, 3-8, 12-14 of Brief in Support of Plaintiff’s Motion to Proceed Anonymously (Dkt. No. 7-1) satisfy Rule 201 because they discuss facts that are generally known in Loudoun County, which is within this Court’s jurisdiction. The articles are also from reliable sources. Lastly, Plaintiffs intend to formally proffer documents containing

the pertinent facts in these news articles once discovery finishes. But for now, they ask the Court to take judicial notice for the purposes of their motion to proceed anonymously.

Respectfully Submitted,

/s/ Jeffrey D. Jennings

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CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2021, a copy of the foregoing was sent via email to the address below pursuant to the parties' agreement:

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DATED: June 28, 2021

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